REMARKS

Applicants respectfully request reconsideration an allowance of the above-identified patent application. By this amendment, claims 1-6, 9-23, and 25-28 remain pending, wherein claims 1, 3, 5, 6, 9-12, 16-23, 25, and 26 have been amended and claims 30-31 have been canceled. Of the pending claims the independent claims include the method of claim 1, the computer program product of claim 18, and computer-readable medium of claim 25.

Initially, Applicants and Applicants' attorney express appreciation to the Examiner for the courtesies extended during the telephonic interview held on October 28, 2006. The amendments and following arguments submitted in this paper are consistent with those presented during the course of the interview.

In the Office action, the independent claims are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,266,681 to Guthrie ("*Guthrie*") in view of U.S. Patent No. 6,668,369 to Krebs et al. ("*Krebs*"). Applicants respectfully traverse these grounds of rejection.

As previously noted, the present invention is generally directed to methods, systems, and computer program products for handling "element behaviors" in web pages. In the past, behaviors were attached in a loosely associated way to a respective element; such behaviors are thus referred to as "attached behaviors". For example, when a web page was accessed by a browser and subsequently processed, an attached behavior was not interpreted until needed, e.g., in order to save time and computing power. Although the component remained attached to an associated element, it was not executed until some later interpretation time, and thus an "attached" behavior is considered as asynchronously binding to an element. Note, however, that

because the behavior can be attached or removed from an element, the behavior is often inadvertently detached either manually or pragmatically, which can have adverse or unexpected effects on some of the existing document. In addition, because attached behaviors are often not instantiated at the time dependent elements try to access them; "attached" behaviors are often unpredictable in the asynchronous parsing of a document.

Accordingly, embodiments herein rectify the deficiencies of the past "attached" behaviors by synchronously binding "element" behaviors to a respective element. More specifically, embodiments provide a special processing instruction used to import the element behavior into a web page, which encapsulates specific functionality or behavior on the web page. Upon parsing the web page, the element behavior is initialized as soon as it has been downloaded and parsed. The element behavior instance can then be used to modify an initial or default behavior of an element within the web page during the processing and parsing thereof. According, the element behavior cannot be disconnected from the underlying element using script or any other mechanisms. In addition, because the initialization of element behavior occurs before the parsing of any of its bound elements, the unpredictability of asynchronous parsing of a document is removed.

Claim 1 is directed toward some of the embodiments mentioned above and recites a method of synchronously binding a behavior component to the element in order to prevent the behavior from being detached there from and for promoting predictability. First, the method receives at a browser application a page for processing and displaying element(s) therein. An import instruction within the page is then process that links implementation of an element behavior with the element(s) of the page, wherein the element behavior is a dynamic hypertext markup language (DHTML) component that encapsulates specific functionality or behavior on

the page. Next, an initial behavior of the element(s) are modified within the page by instantiating an instance of the element behavior component in accordance with the import instruction when a part of the page correspond thereto is parsed by the browser, which synchronously binds the element behavior component to the element. The other independent claims disclose a computer program product and computer-readable medium with elements similar to those described below.

Applicants respectfully submit that the combination of *Guthrie* and *Krebs* does not render the current claimed invention unpatentable for at least the reason that the cited prior art—either taken individually or as a whole—does not disclose or suggest each and every element of the independent claims. For example, the cited *Guthrie* and *Krebs* references do not disclosed or suggest processing from within the page an import instruction that links implementation of an element behavior with element(s) of the page, wherein the element behavior is a DHTML component that encapsulates specific functionality or behavior on the page. In addition, the combination of *Guthrie* and *Krebs* does not disclose or suggest modifying an initial behavior of the element(s) within the page by instantiating an instance of the element behavior component in accordance with the import instruction when a part of the page corresponding thereto is parsed by the browser, which synchronously binds the element behavior component to the element(s).

Guthrie discloses a method and system for inserting code to conditionally incorporate a user interface component in an HTML document. Unlike Applicants claimed invention, *Guthrie* injects code into an HTML document using interceptor code as a proxy server between the user's current browser and a proxy server, if one exits. (*See e.g.*, col. 5, ll. 13-34). The inserted code is then used by the user's browser to generate a "new" component, for example a user interface component. (*See e.g.,* abstract). Because the interceptor code is not part of the original HTML

document, *Guthrie* cannot possibly disclose or suggest processing *from within the page* an import instruction that links implementation of an element behavior with element(s) of the page. In addition, because interceptor code inserts code that simply generates a component, *Guthrie* cannot possibly disclose or suggest *modifying* an initial behavior of the element(s) within the page by instantiating an instance of the element behavior component in accordance with the import instruction. In fact, because the interceptor code in *Guthrie*—used to import or insert code into an existing HTML document—acts as a proxy server separate from the web page itself, and because the inserted code generates a "new" component, *Guthrie* actually "teaches away" from Applicants' claimed invention.

Recognizing some of the deficiencies of *Guthrie* the Office action cites *Krebs*. *Krebs* discloses a software debugging tool for displaying dynamically written software code. The Office action relies on *Krebs* as allegedly teaching a DHTML language being merely a combination of static HTML and dynamic script. *Krebs*, however, is silent with regards to an import instruction or modifying a behavior of an element, *Krebs* cannot possibly rectify those deficiencies noted above with regard to *Guthrie*. Accordingly, Applicants respectfully submit that the combination of *Guthrie* with *Krebs* does not render Applicants' claimed invention unpatentable.

Based on at least the foregoing reasons, Applicants respectfully submit that the cited prior art fails to anticipate or otherwise make obvious Applicants' invention as claimed for example, in independent claims 1, 18, and 25. Applicants note for the record that the remarks above render the remaining rejections of record for the independent and dependent claims moot, and thus addressing individual rejections or assertions with respect to the teachings of the cited art is

unnecessary at the present time, but may be undertaken in the future if necessary or desirable and Applicants reserve the right to do so.

All objections and rejections having been addressed, Applicants respectfully submit that the present application is in condition for allowance, and notice to this effect is earnestly solicited. Should any questions arise in conjunction with this application or should the Examiner believe that a telephone conference with the undersigned would be helpful in resolving any remaining issues pertaining to this application, the undersigned respectfully requests that he be contacted at 1-801-533-9800.

DATED this 15th day of December, 2006.

Respectfully Submitted,

/Wesley C. Rosander, Reg. # 51,030/
Wesley C. Rosander

RICK D. NYDEGGER
Registration No. 28,651
WESLEY C. ROSANDER
Registration No. 51,030
Attorneys for Applicant
Customer No. 047973

WCR:sa
W:\13768\783.284\SDA0000004229V001.DOC